



**Chambers  
Ireland**  
Advancing business together



# Price Control 6 (PC6)

Submission by Chambers Ireland

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## About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

## Key Points

- Security of supply and energy security should be primary objectives of PC6.
- Affordability must remain a core consideration, with businesses protected from avoidable cost increases.
- A targeted and flexible reopener mechanism should allow timely funding of emerging resilience and security requirements.
- Investment decisions should be based on peak demand, resilience and security requirements.
- Essential investment in safety, asset replacement and network capacity must proceed where justified.
- PC6 should strengthen resilience against physical, cyber and supply chain risks through ongoing investment and risk assessment.
- Sufficient network capacity and timely connections are critical to supporting business investment and economic growth.
- Deployment of emerging renewable technologies should be prioritised through connection and injection infrastructure where backed by credible demand.
- PC6 should provide flexibility to support innovation and research into emerging technologies.
- Increased visibility of the investment pipeline is needed to improve delivery, skills planning and supply chain readiness.
- Local suppliers, skills development and SME participation should be supported to strengthen resilience and delivery capability.

## Our Perspective

PC6 should provide a safe, secure and price-resistant framework for Ireland's gas network. It must support security of supply, energy security and economic development while protecting customers from avoidable increases in network charges. Equally, investment should be consistent with achieving the State's climate targets and avoiding unnecessary fossil-fuel lock-in.

The network is a strategic national asset which is underlined by the fact it connects around 28,000 businesses<sup>1</sup> and supports an electricity system in which gas-fired generation continues to play a significant role. Decisions on network capacity and resilience therefore have implications for security of supply, industrial activity and the attractiveness of the State as a location for investment.

We fully support investment where the objective is to improve the resilience of the network. Relatedly, our response to the consultation comes at a time when the State is investing in infrastructure across all areas; and this is required to facilitate a population that will expand significantly. This underlines the importance of proactively investing ahead of demand rather than responding to constraints after they emerge.

Safety-critical works, asset replacement and capacity required for credible demand cannot be deferred without creating larger risks and potentially higher costs. In addition, businesses significantly contribute to the recovery of network costs and expenditure should therefore be proportionate, efficiently delivered and appropriately timed. This balance between investment and affordability forms the basis of our response.

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<sup>1</sup> As stipulated in the consultation document, figures are the latest available and are relevant as of 2025.

## Questions

**Do you agree with how we have described the changing energy environment and the future role of the gas network? What factors do you think should shape gas network investment during PC6?**

We fully support the consideration of peak capacity, flexibility and security of supply in the investment framework. This is important because a network can carry less gas over a year and still be essential during a short period of very high demand or low renewable electricity output.

The relationship between gas and electricity explains why annual throughput alone is an incomplete basis for investment decisions. Natural gas remains central to the State's energy system,<sup>2</sup> and as wind and solar provide a larger share of annual electricity, gas-fired generation may run less frequently but remain necessary when a) renewable output is not at the rate required to meet demand, or b) the electricity system is under significant pressure. The economic value of the network at those times is determined by whether sufficient energy can be delivered when it is needed, and whether it can be supplied at a rate that is feasible.

The same reasoning applies to connections. Businesses make investment decisions on the assumption that essential infrastructure will be available within a credible timeframe. Where network capacity is unavailable, or where a connection cannot be delivered with reasonable certainty, projects can be delayed, reduced in scope or located elsewhere. Ensuring that the investment framework is adaptive enough is critical to account for such scenarios.

PC6 should consequently be tested against peak-hour and peak-day requirements, severe weather, periods of low renewable electricity output and credible new connection demand. In

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<sup>2</sup> Gas accounted for more than 40% of Ireland's electricity generation in 2024, while gas-fired electricity generation currently accounts for around 60% of national natural gas consumption: <https://www.iea.org/reports/powering-irelands-energy-future/executive-summary>

addition, it should account for severe weather events given the increased frequency with which they are estimated to occur as climate change accelerates.

**Are the main challenges facing the gas network clearly explained, including security of supply, affordability, peak demand and future network use? Are there other challenges we should consider?**

We agree with the main challenges that are identified in the document and we particularly welcome the recognition of affordability alongside security of supply. For many businesses, energy remains one of the most significant operating costs and sustained price volatility can reduce margins, delay investment decisions and limit opportunities for growth.

Similarly, businesses need confidence that energy infrastructure is capable of matching current and future demand when making long-term decisions on expansion, electrification and the adoption of new technologies. As energy demand continues to increase, maintaining adequate generation capacity, network infrastructure and system flexibility will be critical to supporting economic activity across all sectors.

In addition to these challenges, it is worth noting that PC6 will take place during a period of extensive investment in electricity, water, housing, transport and renewable energy infrastructure. These programmes will draw on many of the same engineering disciplines, contractors, planning resources and specialist suppliers. Approval of expenditure will not by itself ensure that projects are delivered, and this is important for assets with long manufacturing lead times or a limited supplier base.

If requirements are identified late, Gas Networks Ireland may have to compete for scarce equipment and contractor capacity after other infrastructure providers have already committed their programmes. The likely result would be higher prices, longer delivery times or both. Earlier visibility of the PC6 pipeline would allow the relevant suppliers and contractors to plan capacity, while appropriately structured procurement could give firms a realistic opportunity to participate.

**Do you support our proposed focus on maintaining a safe, secure and resilient gas network? Please tell us why, and whether there are particular areas we should prioritise.**

Security of supply is fundamental to business confidence and the overall economic resilience of the State. Reliable access to energy enables them to operate, invest and grow, while disruptions increase costs, reduce productivity and divert resources away from investment. Given the continuing role of gas in electricity generation, heating and industrial processes, maintaining a resilient network remains an important part of that wider objective.

Ireland remains heavily reliant on imported natural gas<sup>3</sup>. This leaves the State exposed to supply disruptions which has a direct impact on price volatility. Managing such volatility is vital to the ability of businesses to absorb costs and continue operating; particularly at a time when the cost of business has steadily increased in recent years. This is acutely relevant for energy-intensive industries<sup>4</sup> where the cost of gas and electricity significantly threatens their long-term competitiveness<sup>5</sup> but it is also relevant for businesses of all sizes.

It should also be acknowledged that any disruption to the gas network would have consequences well beyond the energy system. Reduced supply could severely interrupt industrial activity and constrain the operations of essential facilities such as the operation of hospitals or other public services. Furthermore, the gas network itself depends on electricity and digital systems to function effectively. This interconnectedness means that failures in one aspect can have cascading effects across others, with impacts felt throughout the wider economy.

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<sup>3</sup> More than 82% of supply comes from abroad and over half of all energy imports sourced from the United Kingdom:

<https://www.seai.ie/news-and-events/news/significant-reliance-imported-fossil-fuels-leaves-ireland-exposed-global-energy-shocks-despite-renewable-energy-progress>

<sup>4</sup> The cost of electricity is widely viewed as a global constraint on the competitiveness of the sector:

<https://www.iea.org/reports/gaining-an-edge/energy-demand-and-competitiveness>

<sup>5</sup> As acknowledged by the European Commission in its Report on Energy Prices and Costs in Europe:

[https://www.europarl.europa.eu/RegData/docs\\_autres\\_institutions/commission\\_europeenne/com/2025/0072/COM\\_COM%282025%290072\\_EN.pdf](https://www.europarl.europa.eu/RegData/docs_autres_institutions/commission_europeenne/com/2025/0072/COM_COM%282025%290072_EN.pdf)

This interdependence is why expenditure linked to security should be assessed considering the potential impact of disruption as well as the frequency with which a particular event has occurred. Physical, cyber or hybrid incidents may appear remote, however, if actioned then their consequences would be extensive. Preventive maintenance and secure, tested emergency arrangements will reduce both the probability of failure and the time required to restore services where they may require attention.

PC6 should provide the resources needed to translate such risks into practical measures<sup>6</sup> and the plan should fund a continuing cycle of risk assessment. Regular testing will be necessary and reviews should cover key suppliers and technology providers, since parties can be exposed through third parties even where its own systems are well protected.

The five-year duration of PC6 is also material and a cyber control or threat assessment that is adequate at present may not remain adequate in 2032. This is increasingly relevant given that hybrid threats can combine a range of areas including cyber activity, physical interference and pressure on suppliers, which adds complexity to the system. It would therefore be insufficient to fund a once-off security programme at the beginning of the period and assume that the risk remains static.

Accordingly a defined reopener for material resilience requirements would allow the CRU to examine evidence and approve proportionate expenditure where necessary, but it should be undertaken in a timely manner. This should be bounded by clear triggers and reporting so that it would facilitate GNI in accessing required additional funding without delay.

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<sup>6</sup> The National Cyber Security Centre's assessment of the threat environment identifies geopolitical change, evolving technology and supply-chain security as systemic risks: [https://assets.gov.ie/static/documents/46bd0747/NCSC-2025\\_National\\_Cyber\\_Risk\\_Assessment.pdf](https://assets.gov.ie/static/documents/46bd0747/NCSC-2025_National_Cyber_Risk_Assessment.pdf)

**Do you agree with our proposed approach to supporting low-carbon and renewable gases, including biomethane in the near term and hydrogen readiness over time? Are there specific actions you think should be prioritised during PC6?**

We support the proposed distinction between biomethane in the near term and hydrogen readiness over time. The technologies are at different stages of policy and market development, and PC6 should reflect that difference rather than applying the same investment approach to each.

It is important that the State adopts a technology-neutral approach to achieving its climate targets and a range of technologies will be essential to doing so. The most recent projections indicate that even with the full implementation of planned measures, emissions are expected to fall by only up to 25% by 2030 compared with the national target of 51%, while nearly all sectors remain on a trajectory to exceed their sectoral emissions ceilings.<sup>7</sup> This underlines the importance of maintaining optionality and supporting technologies that can contribute to decarbonisation, particularly in sectors where alternative pathways remain limited or uncertain. It also underlines the necessity for financial supports and investment that should be available for research and development in the technologies that will aid the State in achieving those aims.

Given the pace of change in the energy sector, it is critical that GNI has access to funding when required, to respond to opportunities and policy priorities as they emerge but also to get ahead of the curve. This is especially relevant in terms of innovation and research into new technologies. A reopener mechanism would provide the flexibility needed to progress strategic investments at the appropriate time and ensuring that potentially valuable projects are not delayed by the timing of a price control determination.

In terms of biomethane, the network will only enable the contribution of biomethane if producers can secure connections on predictable terms and gas can be moved from production areas to

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<sup>7</sup> <https://www.epa.ie/news-releases/news-releases-2026/epa-projections-show-ireland-remains-off-track-for-2030-climate-.php>

demand. This is the basis for prioritising timely connections and injection capacity. Notably, where evidence shows it is needed, reverse compression or local reinforcement should also be prioritised. Such investment should follow credible project pipelines and clear cost-recovery arrangements. That would reduce the risk of building capacity before production materialises while avoiding a situation in which viable projects cannot proceed because network decisions come too late.

Emerging technologies may have an important role to play in the decarbonisation of industrial sectors where emissions are difficult or costly to eliminate. PC6 should therefore ensure that investment is evidence-led and proportionate. Where credible demand, policy certainty and a clear delivery pathway emerge during the PC6 period, GNI should have access to appropriate mechanisms to progress preparatory work and strategic investments.

**Do you agree with our proposed focus on affordability, customer value, transparency and service quality during PC6? How can Gas Networks Ireland better support customers during this period of change?**

As stated elsewhere in our submission, affordability must be assessed in the context of the cumulative cost pressures facing Irish businesses. Energy, labour, insurance, finance and regulatory costs all affect the same operating margin<sup>8</sup> and any price increase would impair their competitiveness. An increase that appears limited when considered as a single tariff component can still be significant when added to the wider cost base of a small or energy-intensive business. PC6 should therefore seek to minimise avoidable costs while ensuring that infrastructure remains capable of supporting economic growth and the wider energy transition.

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<sup>8</sup> This was acknowledged in the recent Cost of Business Advisory Forum report, which brought together stakeholders from across sectors including representatives nominated by Chambers Ireland:

<https://enterprise.gov.ie/en/publications/publication-files/cost-of-business-advisory-forum-final-report.pdf>

Additionally, ageing assets, capacity shortages and emergency interventions can create higher long-term costs, while unreliable infrastructure imposes direct costs through interrupted production and lost investment. A price-resistant framework will therefore require efficient investment.

In terms of supporting customers, publishing clear connection milestones and expected timelines with early notice where a project is at risk of delay will aid businesses during the transition period.

**Are there any other priorities, benefits or outputs that Gas Networks Ireland should consider as we finalise the proposed PC6 Business Plan? Please share any further thoughts or recommendations.**

Developing indigenous capability has a resilience benefit as well as an economic one. Local suppliers should be facilitated in participating in supply chains and a broader domestic base for maintenance, engineering and project delivery can reduce exposure to external disruption and improve the speed of response when problems arise.

In this context there is also a skills dimension to be considered. A clear multi-year pipeline would give the contractor market and education providers better information on future demand. By extension, this would allow procurement to be structured in a way that has a dual purpose in terms of supporting competition while affording capable domestic SMEs a practical opportunity to enter the supply chain.